

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
LPFM Licensees Propose Necessary)	RM-11753
Improvements to the Low Power FM)	
(LPFM) Radio Service)	

To: The Commission (Electronically Filed)

COMMENTS OF SUMARRASE, INC.

1. Sumarrase, Inc. ("Sumarrase") submits these Comments in support of the above-captioned petition for rulemaking by the Low Power FM Advocacy Group.¹ Sumarrase is the permittee of Low Power FM Station WSGD-FM, Facility ID 194387, Lehigh Acres, Florida. The station is under construction now, and we hope to have it on the air soon.

2. Sumarrase's principals have worked for many years to find a broadcast outlet through which they can serve the public with programming not otherwise available to the local community. LPFM is providing an exciting opportunity to make that dream come true.

3. We think that the proposals in the Petition make good sense, especially the proposal to allow at least some commercial messages on LPFM stations. The job of attracting financial support for LPFM stations is challenging at best. While the noncommercial rules do allow acknowledgement of contributions from commercial entities, the restrictions on promotional wording will often be unacceptable to many of the small businesses that are the most likely sources of contributions to support LPFM stations. Large corporations have learned to create "slogans" and other ways of promoting their products and services within the

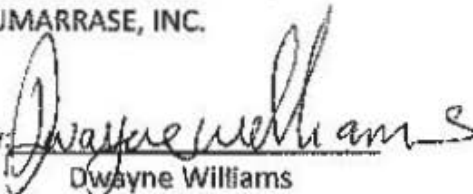
¹ Comments were invited by Public Notice, "Petitions for Rulemaking Filed," Report No. 3026, released July 31, 2015.



constraints of the FCC's noncommercial regulations; but small businesses do not have the time, patience, or expertise to make sure that they jump through the proper hoops. It is the small business community, comprised of local entrepreneurs rather than national chains that rely on computer-driven advertising agencies, that is most likely to support an LPFM station with a small service radius and highly localized programming. We think that the FCC should adjust its rules to better accommodate the needs of both LPFM stations and their supporters.

4. If the FCC does relax its rules, WSGD-LP will be pleased to operate under those new rules and will make every effort to comply.

Respectfully submitted,
SUMARRASE, INC.

By: 
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President

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